

JONATHAN O. PENA, ESQ.
CA Bar ID No. 278044
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 559-412-5390
Fax: 866-282-6709
info@jonathanpena.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Kathrine Renee Velasquez,
Plaintiff,
vs.
Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

} Case No. 1:23-cv-00367-SKO

} STIPULATION AND UNOPPOSED
MOTION FOR EXTENSION OF
TIME; ORDER

} (Doc. 15)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 4-day extension of time, from August 14, 2023 to August 18, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs

1 being due on the same week. For the weeks of August 14, 2023 and August 21,
2 2023, Counsel currently has 3 merit briefs, and several letter briefs and reply
3 briefs. Counsel requires additional time to brief the issues thoroughly for the
4 Court's consideration. Defendant does not oppose the requested extension.
5 Counsel apologizes to the Defendant and Court for any inconvenience this may
6 cause.

7
8 Respectfully submitted,

9 Dated: May 24, 2023 PENA & BROMBERG, ATTORNEYS AT LAW
10

11 By: /s/ Jonathan Omar Pena
12 JONATHAN OMAR PENA
13 Attorneys for Plaintiff

14
15
16 Dated: May 24, 2023 PHILLIP A. TALBERT
17 United States Attorney
18 MATHEW W. PILE
19 Associate General Counsel
20 Office of Program Litigation
Social Security Administration

21
22 By: */s/ Jamala Edwards
23 Jamala Edwards
24 Special Assistant United States Attorney
Attorneys for Defendant
25 (*As authorized by email on May 24, 2023)

ORDER

Pursuant to the parties' foregoing stipulation and unopposed motion for an extension of time (Doc. 15), IT IS HEREBY ORDERED that Plaintiff shall have an extension, up to and including August 18, 2023, to file Plaintiff's Motion for Summary Judgment. The deadlines in the Scheduling Order (Doc. 5) are hereby extended accordingly.

IT IS SO ORDERED.

Dated: **August 15, 2023**

/s/ Sheila K. Oberto

UNITED STATES MAGISTRATE JUDGE